

IN THE UNITED STATES DISTRICT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

FILED

JUN 9 2008 AMW
JUN 9 2008

**MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT**

Charles B. Hill jr.,)
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)
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-vs-)
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)
County of Cook a Corporation,)
Cook County Department of Corrections,)
Cermak Health Services, Dr. Catoure,)
John Doe Dentist #1, Jane Doe Dentist #2,)

Case No: 08 C 1917

Judge: Milton Shadur

MOTION FOR APPOINTMENT OF COUNSEL

Now Comes the plaintiff, Charles Hill jr, Pro se pursuant to 28 U.S.C. 1915(e)(1). Plaintiff moves for an order appointing counsel to represent him in this case. In support of this motion plaintiff states the following:

1). That plaintiff is incarcerated at the Cook County Department of Corrections. Because of his incarceration he is indigent and therefore unable to obtain legal counsel from the private sector to litigate his cause.

2). The plaintiff has requested leave to file *informa pauperis* and it has been granted.

3). The plaintiff is a thirty seven year old African American Male that has never been incarcerated in his life and is also a veteran of Desert Shield/ Desert Storm, he was honorably discharged. He has no background in legal matters such as this.

4). The plaintiff's incarceration will greatly limit if not completely hinder his ability to litigate his cause. The issues involved in this case are complex and require research and investigation that the plaintiff will not be able to undertake such tasks because of his present incarceration.

5). The plaintiff has limited access to the law library at th Cook County Jail. The law library is inadequate in that it is either missing or not equipped with the necessary materials needed to aid the plaintiff in his Civil Tort Claim should this cause make it to trial.

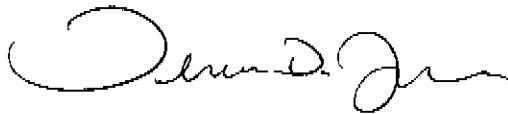
6). A trial in this case will likely involve conflicting testimony, and counsel would better enable plaintiff to present evidence and cross examine witnesses as well as provide expert witnesses if necessary should this cause make it to trial.

7). The plaintiff has a Constitutional right to the representation by counsel. citing: **Montgomery v. Pinchak**, 294 F. 3D 492,499 (3rd Cir. 2002), **Hendricks v. Coughlin**, 114 F. 3D 390 (2D Cir. 1997), and **Farham v. Johnson**, 126 F. 3D 454,461 (3rd Cir. 1997).

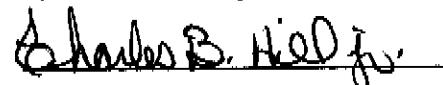
8). The plaintiff has made repeated attempts to try and procure legal assistance for his cause. Attached is a copy of the letter that I forwarded to various legal firms requesting help in my legal endeavors. Also inclosed is a list of the legal firms that I sent letters to and have not received an answer back. I placed these letters in the mail at the Cook County Jail on 11 May 2008.

WhereFore, plaintiff, Charles Hilljr., prays that in the interest of justice that this Honorable Court will grant his motion for appointment of counsel and any other relief that the court deems necessary to insure that the plaintiff has a fair and just result.

SWORN AND AFFIRMED BEFORE ME
THIS 21st DAY OF MAY 2008



RESPECTFULLY , SUBMITTED



11 May 2008

Charles B. Hill jr.
20050084808 Div. #8
P.O. Box 089002
Chgo, Ill, 60608

re: Legal Representation

To whom it may concern I the under signed I am presently seeking Legal Counsel to aid me in pursuing a Civil Tort claim against the Cook County Jail and it's health care provider as well as several doctors and administrators. I am currently pro se and am at a point where I need legal assistance. Any help that you you could give is and would be appreciated. I am currently indigent and incarcerated at the Cook County Department of Corrections. I do not have the monetary means to hire an attorney from the private sector so if you have a pro bono program where I fit the critera please help me. If not please direct me to where I can get the help that I require in pursuit of my endeavors. Thank you for your cooperation and your help in this matter.

RESPECTFULLY , YOURS

Charles B. Hill Jr.